

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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X  
SANDRA L. MACAULAY, AS ADMINISTRATRIX      CIVIL ACTION  
FOR THE ESTATE OF CHRISTOPHER A.  
MACAULAY,      NO. 07 CA 10864 NG  
  
Plaintiff

VS.

MASSACHUSETTS BAY COMMUTER  
RAILROAD COMPANY,

Defendant

FEBRUARY 14, 2008

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X

**PLAINTIFF'S MOTION TO COMPEL**


Pursuant to Fed. R. Civ. P. 37 and D. Mass. Loc. R. 37.1, the plaintiff hereby moves to compel the defendant to produce all responsive documents and materials to Requests For Production (RFP) 1, 3, 7, 9, 10, 12, 13, 16, 17, 18, 20, 21, 27, 31, 37, 38, 39, 40, 41, 42, and 43 and to respond completely to interrogatories 9, 10, 14, 15, and 16 from the plaintiff's October 22, 2007 dated RFP and Interrogatories.

The plaintiff hereby certifies that the provisions of Fed. R. Civ. P. 37 and D. Mass. Loc. R. 37.1 were complied with over the telephone on January 18, 2008 from 2:30 p.m. to 3:40 p.m. and on February 13, 2008 from 3:05 p.m. to 3:25 p.m.

**ORAL ARGUMENT REQUESTED**


A Memorandum of Law and an Affidavit in support of this motion are being filed herewith this same day.

FOR THE PLAINTIFF, SANDRA L. MACAULAY,  
AS ADMINISTRATRIX FOR THE ESTATE  
OF CHRISTOPHER A. MACAULAY,

By   
George J. Cahill, Jr. (BBO #069480)  
Scott E. Perry (ct17236)  
CAHILL, GOETSCH, & MAURER, P.C.  
43 Trumbull Street  
New Haven, Connecticut 06510  
(203) 777-1000

**CERTIFICATE OF SERVICE**

I hereby certify that on February 14, 2008, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

  
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Scott E. Perry